

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

NEORA, LLC, SIGNUM BIOSCIENCES,
SIGNUM NUTRALOGIX, and
JEFFREY OLSON,

Defendants.

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Civil Action No. 3:20-cv-01979-M

DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.3, Defendants Neora, LLC and Jeffrey Olson ("Defendants") move this Court to enter summary judgment against Plaintiff Federal Trade Commission ("Plaintiff") on Plaintiff's claim against Defendants that they violated the Federal Trade Commission Act by operating or promoting participation in an illegal pyramid scheme (Count I of Plaintiff's Complaint for Permanent Injunction and Other Equitable Relief (Dkt. 1)).

The matters required by Local Rule 56.3(a) will be set forth in Defendants' Sealed Brief in Support of their Motion for Partial Summary Judgment, filed concurrently with this Motion.

WHEREFORE, Defendants respectfully request that the Court enter an order granting this Motion, as well as such other and further relief at law or in equity to which Defendants may show themselves justly entitled.

Date: July 13, 2022

Respectfully submitted,

/s/ Craig B. Florence

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**COUNSEL FOR DEFENDANTS
NEORA, LLC and JEFFREY OLSON**

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the above and foregoing document has been served on July 13, 2022 on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Craig B. Florence

Craig B. Florence